UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

§	
§	
§	
§	Civil Cause: 3:21-CV-1171-B
§	
8	
§	
§	
	co co co co co co co

Unopposed Motion to Withdraw and Substitute Counsel – Defendant Paula Ketter
TO THE HONORABLE JUDGE OF SAID COURT:

Pursuant to Local Civil Rule 83.12, Jason T. Rodriguez and Steven W. Thornton request that this Court permit Jason T. Rodriguez, Timothy Woods, Gordon Green and *Higier Allen & Lautin, P.C.* to withdraw as an attorney of record for Defendant Paula Ketter and substitute Steven W. Thornton as an attorney of record for Defendant Paula Ketter. Good cause exists for this Court to grant this motion due to a potential conflict of interest between Defendant Ketter and other defendants which could make continued representation of all defendants by Jason T. Rodriguez and Higier Allen & Lautin, P.C. untenable. This request is not made for purposes of delay.

For these reasons, Jason T. Rodriguez and Steven W. Thornton request that this Court grant this Motion permitting Jason T. Rodriguez, Timothy Woods, Gordon Green and *Higier Allen & Lautin, P.C.* to withdraw from representing Defendant Paula Ketter and substituting Steven W. Thornton as an attorney of record for Defendant Paula Ketter.

Respectfully submitted,

WESTERBURG & THORNTON, P.C. 10440 N. Central Expressway, Suite 800

Dallas, Texas 75231

Phone No.: 214.528.6040 Facsimile: 214.540.7207

Email: steve@mwtlaw.com

By:

Steven Thornton

State Bar No. 00789678

HIGIER ALLEN & LAUTIN, PC

2711 N. Haskell Ave., Suite 2400

Dallas, Texas 75204

Telephone: (972) 716-1888 Facsimile: (972) 716-1899

Email: jrodriguez@higierallen.com

By: /s/ Jason T. Rodriguez

Jason T. Rodriguez

Texas State Bar No. 24042827

Paula Ketter		

Agreed:

Respectfully submitted,

WESTERBURG & THORNTON, P.C. 10440 N. Central Expressway, Suite 800 Dallas, Texas 75231

Phone No.: 214.528.6040 Facsimile: 214.540.7207

Email:

steve@mwtlaw.com

By:

Steven Thornton State Bar No. 00789678

HIGIER ALLEN & LAUTIN, PC 2711 N. Haskell Ave., Suite 2400

Dallas, Texas 75204

Telephone: (972) 716-1888

Facsimile:

(972) 716-1899

Email:

jrodriguez@higierallen.com

By:

Jason T. Rodriguez Texas State Bar No. 24042827

Agreed:

Paula Ketter

CERTIFICATE OF SERVICE

I certify that a true copy of the above was served on each attorney of record or party in accordance with the Texas Rules of Civil Procedure on this 11thday of March, 2022.

Steven Thornton

CERTIFICATE OF CONFERENCE

I certify that I conferred with Plaintiffs' counsel, Jason Freeman, regarding the merits of this motion. Mr. Freeman indicated that the Plaintiffs do not oppose this motion.

Steven Thornton